UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 2003-CV-12426 RCL

)
CARE	REE 1	PARK	CC	RPORAT	ION,)
AMIN	NABH	AN a	nd	JAMILE	NABHAN)
)
Plaintiffs,)						
)
v.)
)
ADIB	NABHA	AN)
				lant.)
		Der	enc	lant.) \
	·····					_/

DEFENDANT'S PROPOSED JURY QUESTIONS

Defendant, Adib Nabhan, has reviewed the proposed jury questions submitted by plaintiffs and hereby objects to question number four (4) as presently worded and, in addition, submits the following additional questions for the Court's consideration. 1

14. [To be inserted after Proposed Question 13] Did

Amin and Jamile Nabhan breach their fiduciary duties to

Adib Nabhan by freezing him out of Carefree Park

Corporation?

Y	es	No	

21. [To be inserted before Proposed Question 18] When did Amin Nabhan know or should have known that Adib Nabhan

Plaintiffs' counsel has indicated that they object to these questions.

incorporated Fun Depot, Inc. as the sole shareholder of a Subchapter S Corporation?

Date:____

ADIB NABHAN

By his attorney,

/s/ Ian Crawford Ian Crawford(BBO#544475) Todd & Weld LLP 28 State Street Boston, MA 02109 (617) 720-2626

Doyle C. Valley, Esquire Morrison Mahoney LLP 250 Summer Street Boston, MA 02210 (617) 737-8846

DATED: February 28, 2006

CERTIFICATE OF SERVICE

I, Ian Crawford, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 28, 2006.

/s/ Ian Crawford
Ian Crawford